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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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John Doe,  
Plaintiff,  
v.  
Baila Sebrow  
Defendant.

Case No. 2:21-cv-20706-SDW-ESK

**DECLARATION OF JOHN DOE**

I, John Doe, being of full age, hereby declare:

1. I am the Plaintiff in the above-captioned case. I submit this Declaration in support of my request to proceed under the pseudonym “John Doe” and to restrict access to Docket Entry 13.
2. I request the court permit me to bring this case as “John Doe” for several reasons.
3. Baila Sebrow (the “Defendant”) has created false lies about me that are not extremely embarrassing to me and my family, but also have been very traumatic to me. I have provided my attorney with a sampling of text messages that I received from Defendant and they have been included in his memorandum of law. I affirm that each of these messages was received by me from Defendant.

4. Defendant harassed me and spread these lies in an attempt to prevent me from going forward with the abuse I have sustained at her hands. She knows how important my reputation is and knows that her comments were designed to prevent me from hiring a lawyer to fight her. She proudly boasts that she can falsely accuse me of rape because no one would believe me over her.

5. Defendant has not only attempted to ruin my life but the lives of my children and grandchildren as well. She constantly made vulgar statements about my daughter's physical appearance and mental health. She falsely accused me of raping my daughter. At her deposition, Defendant, for the first time in five years, created another lie, this time alleging I made her role play while we had sex and forced her to pretend to be my daughter. This is not true. Should my daughter or our community learn this lie, there is no telling the trauma it will cause.

6. I have not told many people, if any, the full extent of Defendant's conduct towards me. I feel traumatized and embarrassed by what happened, and it is very hard for me to talk about it. I am a member of the Orthodox Jewish community, which is small and insular. I am in fear that once several people learn about this case, it will spread throughout the community.

7. I am terrified that bringing a lawsuit publicly will make me and my family a target for future harassment. Sebrow has retaliated against me every step of the way for this lawsuit. Just this week, she presented a fraudulent, doctored, email during her deposition.

8. Because of Defendant's conduct, I am unable to sleep at night, have lost weight, and am always stressed. I have not gone to any events where she may be out of fear that she will once again falsely accuse me of rape.

9. I spent my entire life building my career, and my name and reputation would be ruined if Defendant was allowed to unmask me in public filings.

10. I was granted a temporary restraining order against Defendant in part because of her conduct alleged in this case. Her conduct is not only immoral and tortious but also criminal.

11. I have been permitted to use John Doe for over a year in this litigation and Defendant has no litigate reason to now force me to use my true name other than to try to cause me more trauma and stress.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 8, 2023  
West Orange, New Jersey

JOHN DOE

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JOHN DOE